

## EXHIBIT GG

**From:** [Ben Watson](#)  
**To:** [Bryan Aylstock](#); [Daniel Thornburgh](#); [William Gage](#)  
**Cc:** [Ben Anderson](#); ["Tom P. Cartmell \(tcartmell@wcllp.com\)"](#); [Renee Baggett](#); [Betsy Williams](#); [Rich Freese](#); [Andrew N. Faes](#)  
**Subject:** RE: Heniford DVDs  
**Date:** Friday, November 15, 2013 4:04:52 PM

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Bryan,

We have previously looked into this issue and have not been able to locate any additional videos. We have again asked our team for any additional leads. If we find anything else, we will let you know next week.

***Benjamin M. (Ben) Watson***

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About Butler Snow

Bio

V-Card

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**From:** Bryan Aylstock [mailto:[BAylstock@awkolaw.com](mailto:BAylstock@awkolaw.com)]  
**Sent:** Friday, November 15, 2013 12:55 PM  
**To:** Daniel Thornburgh; Ben Watson; William Gage  
**Cc:** Ben Anderson; 'Tom P. Cartmell ([tcartmell@wcllp.com](mailto:tcartmell@wcllp.com))'; Renee Baggett; Betsy Williams; Rich Freese; Andrew N. Faes  
**Subject:** RE: Heniford DVDs

Ben/William,

I know everyone is extremely busy but unless I've missed some emails it is now been over three weeks since we made this request (and I followed up since then), and we have heard absolutely nothing. Did I miss something? If not, what gives? We know this exist as do you so please produce them immediately. If they have been destroyed, please let us know that as well.

Thanks,  
Bryan

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**From:** Daniel Thornburgh  
**Sent:** Wednesday, October 23, 2013 12:40 PM  
**To:** Ben Watson; Bryan Aylstock; William Gage  
**Cc:** Ben Anderson; 'Tom P. Cartmell ([tcartmell@wcllp.com](mailto:tcartmell@wcllp.com))'; Renee Baggett; Betsy Williams  
**Subject:** RE: Heniford DVDs  
**Importance:** High

Ben,

I received the production today; however, Ethicon only produced the final version of the 2007 DVD called the "Benefits of Lightweight Meshes" which does not fully respond to plaintiffs' multiple requests for the production of "all videos (whether final or in draft form) related to Dr. Heniford's CDs or DVDs." We have reason to believe additional media exists. For example, the attached document indicates that in 2004, Dr. Heniford sent at least one other dvd or cd to Ethicon. Does that or any other CD or DVD exist? If so, please produce it along with all other DVDs or CD related to Dr. Heniford. If no other DVDs, CDs, video clips or other related media exists related to Dr. Heniford, then please certify that reasonable steps were taken to locate and produce the requested material. With Dr. Heniford's deposition scheduled for Nov. 21, 2013, it is imperative that you produce these additional materials immediately so that we have a reasonable opportunity to review the same prior to his deposition.

Let me know if you have any questions.

Regards,

Dan Thornburgh

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**From:** Ben Watson [<mailto:Ben.Watson@butlersnow.com>]  
**Sent:** Monday, October 21, 2013 9:45 PM  
**To:** Daniel Thornburgh; Bryan Aylstock; William Gage  
**Cc:** Ben Anderson; 'Tom P. Cartmell ([tcartmell@wcllp.com](mailto:tcartmell@wcllp.com))'; Renee Baggett; Betsy Williams  
**Subject:** RE: Heniford DVDs

Dan,

No problem. We will send you a copy tomorrow.

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**From:** Daniel Thornburgh [<mailto:DThornburgh@awkolaw.com>]  
**Sent:** Monday, October 21, 2013 8:26 PM  
**To:** Ben Watson; Bryan Aylstock; William Gage  
**Cc:** Ben Anderson; 'Tom P. Cartmell ([tcartmell@wcllp.com](mailto:tcartmell@wcllp.com))'; Renee Baggett; Betsy Williams  
**Subject:** RE: Heniford DVDs  
**Importance:** High

Ben,

Please also federal express the Heniford CDs/DVDs (or any other related material that you sent to Crivella West today, per your below email) to my office by tomorrow for overnight delivery. Thanks in advance.

Sincerely,

Daniel Thornburgh  
Aylstock, Witkin, Kreis & Overholtz

17 E. Main Street, Ste 200  
Pensacola, FL 32502

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**From:** Ben Watson [<mailto:Ben.Watson@butlersnow.com>]  
**Sent:** Monday, October 21, 2013 4:56 PM  
**To:** Bryan Aylstock; William Gage  
**Cc:** Ben Anderson; 'Tom P. Cartmell ([tcartmell@wcllp.com](mailto:tcartmell@wcllp.com))'; Renee Baggett; Daniel Thornburgh; Betsy Williams  
**Subject:** RE: Heniford DVDs

Bryan,

This is being shipped to Crivella West tonight.

Thanks.

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**From:** Bryan Aylstock [<mailto:BAylstock@awkolaw.com>]  
**Sent:** Friday, October 18, 2013 5:23 PM  
**To:** William Gage; Ben Watson  
**Cc:** Ben Anderson; 'Tom P. Cartmell ([tcartmell@wcllp.com](mailto:tcartmell@wcllp.com))'; Renee Baggett; Daniel Thornburgh; Betsy Williams  
**Subject:** RE: Heniford DVDs

William/Ben,

Following up here as well. Please let us know ASAP.

Thanks  
bryan

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**From:** Bryan Aylstock  
**Sent:** Tuesday, October 08, 2013 1:02 PM  
**To:** William Gage; Ben Watson  
**Cc:** Ben Anderson; Tom P. Cartmell ([tcartmell@wcllp.com](mailto:tcartmell@wcllp.com)); Renee Baggett; Daniel Thornburgh  
**Subject:** Heniford DVDs  
**Importance:** High

Ben/William,

As you know we previously requested all videos (whether final or in draft form) related to Dr. Heniford's CDs or DVDs on heavyweight/small pore hernia meshes but I don't believe those have been produced yet. Attached is the email from May 4, 2004 that discusses a video clip from Heniford that was sent to Jill Schiaparelli. Please produce the video clip that was sent to Ms. Schiaparelli and all others from Dr. Heniford related to this issue. Can you please let us know when we can expect these materials?

Thanks,  
Bryan

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